

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

**VÍCTOR RAMOS SANTIAGO, ET AL**

Plaintiffs

**v.**

**WHM CARIB, LLC, ET AL**

Defendants

CIVIL No. 14-1087 (SEC)

Age Discrimination (PR Law 100);  
Unjust Dismissal (PR Law 80); Torts  
and Lost Financial Support

**STATEMENT OF UNCONTESTED FACTS**  
**IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT**

Index of Exhibits

- |            |   |
|------------|---|
| Exhibit 1  | Víctor Ramos' deposition  |
| Exhibit 2  | Memo from Arturo Ortiz dated May 10 <sup>th</sup> , 2007  |
| Exhibit 3  | Acknowledged receipts   |
| Exhibit 4  | Wyndham's Business Principles Book  |
| Exhibit 5  | Wyndham's Employee Handbook   |
| Exhibit 6  | Wyndham Río Mar's Answers to Plaintiffs' Set of Interrogatories and Requests for Production of Documents                                      |
| Exhibit 7  | Wyndham's Tips Policy   |
| Exhibit 8  | Tournament Coordinator's Job Description  |
| Exhibit 9  | Itinerary of College of Engineers and Land Surveyors of Puerto Rico held its Annual Convention at Wyndham Río Mar from August 9 thru 12, 2013 |
| Exhibit 10 | Itinerary of Pro Am Golf Tournament at Wyndham Río Mar's golf course on August 8, 2013  |
| Exhibit 11 | Email from Víctor Ramos to Marissa Gasparoli dated July 16, 2013  |
| Exhibit 12 | Email from Víctor Ramos dated July 23, 2013 to Marissa Gasparoli, among others  |
| Exhibit 13 | Minutes of Meeting between Víctor Ramos and Jeff Willenberg   |
| Exhibit 14 | Email from Marissa Gasparoli to Víctor Ramos dated July 24, 2013  |
| Exhibit 15 | Check Number 054632 for \$3,000 to Víctor Ramos from College of Engineers and Land Surveyors of Puerto Rico                                   |
| Exhibit 16 | Invoice by Víctor Ramos to College of Engineers and Land Surveyors of Puerto Rico for \$3,000   |

- Exhibit 17 Email from Marissa Gasparoli to Luis Manuel dated July 27, 2013
- Exhibit 18 Héctor Aponte's deposition
- Exhibit 19 Breakdown of the \$3,000.00
- Exhibit 20 Email to Johanna Vargas to Kelli Joseph
- Exhibit 21 Email to Johanna Vargas from Jeff Willenberg dated August 13, 2013
- Exhibit 22 Associate Performance Action Form
- Exhibit 23 Statement by Víctor Ramos dated August 9, 2013
- Exhibit 24 Wyndham Rio Mar's corporate deposition
- Exhibit 25 Handwritten minute by Johanna Vargas dated August 15, 2013
- Exhibit 26 Email from Kelli Joseph to Johanna Vargas dated August 14, 2013
- Exhibit 27 Kelli Joseph's deposition
- Exhibit 28 Johanna Vargas deposition
- Exhibit 29 Danny William's deposition
- Exhibit 30 Jeff Willmberg Statement Under Penalty of Perjury